

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CATHY D. BROOKS-MCCOLLUM, et al.)	
)	
Plaintiff,)	Civil Action No. 04-419 JJF
)	
v.)	
)	
STATE FARM INSURANCE COMPANY,)	
)	
Defendant.)	

**ANSWER OF DEFENDANT STATE FARM INSURANCE COMPANY TO
PLAINTIFF'S REQUEST FOR ADMISSIONS DIRECTED TO ED B. RUST**

The defendant State Farm objects to the Request for Admission directed to Edward B. Rust on the ground that he is not a party to this litigation and State Farm was not properly served with the Request for Admissions. Insofar as the requests can be considered a Request for Admissions directed to State Farm, it answers as follows.

1. Denied.
2. Denied.
3. Rust is unable to admit or deny the request. Affirmative defenses were determined by counsel.
4. Denied.
5. Denied.
5. [sic there are two number 5's] Denied.
6. Denied.
7. Rust is unable to admit or deny the request as stated.
8. Denied.
9. Denied.

10. Denied.
11. Denied.
12. Denied.
13. Denied.
14. Denied.
15. Denied.
16. Denied.
17. Denied.
18. Denied.
19. Denied.
20. Denied.
21. Denied.
22. Denied.
23. Denied.
24. Denied.
25. Denied.
26. Denied.
27. Denied.
28. Denied.
29. Denied.
30. Denied.
31. Denied.
32. Denied.

33. Denied.

34. Denied.

35. Denied.

36. Denied.

37. Denied.

38. Denied.

39. Denied.

40. Denied.

41. Denied.

42. Denied.

43. Denied.

44. Denied.

45. Denied.

46. Denied.

47. Denied.

48. Denied.

49. Denied.

50. Denied.

51. Denied.

52. Denied.

53. It is admitted that State Farm issued a policy to Emerald Ridge Service Corporation.

Insureds under the policy are defined by the policy.

- 54. Denied.
- 55. Denied.
- 56. Denied.
- 57. Denied.
- 58. Denied.
- 59. Denied.
- 60. Denied.
- 61. Denied.
- 62. Denied.
- 63. Denied.
- 64. Rust has insufficient information in which to admit or deny this averment.
- 65. Denied.
- 66. Denied.
- 67. Denied.
- 68. Denied.
- 69. Denied.
- 70. Rust cannot admit or deny this averment because it does not seek an admission.

CASARINO, CHRISTMAN & SHALK, P.A.

/s/ Stephen P. Casarino
STEPHEN P. CASARINO, ESQUIRE
BAR I.D. NO. 174
800 North King Street, Suite 200
Wilmington, DE 19801
Attorney for Defendant

CERTIFICATE OF SERVICE

I, Stephen P. Casarino, Esq., hereby certify that I have caused to be deposited in the mailbox at 800 North King Street, Suite 200, Wilmington, DE 19801, on this 23rd day of August 2007, a true and correct copy of the attached Objection to Request for Admission to:

Cathy D. Brooks-McCollum
115 Emerald Ridge Drive
Bear, DE 19701

CASARINO, CHRISTMAN & SHALK, P.A.

/S/ Stephen P. Casarino
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